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THOMPSON LAW, LLC

Facsimile: (670) 233-0776

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Attorneys for Marianas Pacific Express, LLC d/b/a Marianas Southern Airways and Keith Stewart

IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN MARIANA ISLANDS

STAR MARIANAS AIR INC.,

Plaintiff,

vs.

SOUTHERN AIRWAYS EXPRESS, LLC, MARIANAS PACIFIC EXPRESS, LLC d/b/a MARIANAS SOUTHERN AIRWAYS, and KEITH STEWART,

Defendants.

Case No. 1:24-CV-00010

MARIANAS PACIFIC EXPRESS, LLC dba MARIANAS SOUTHERN AIRWAYS, AND KEITH STEWART'S LIMITED INITIAL DISCLOSURES

Pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure and the Scheduling Order (ECF No. 69), Defendant Marianas Pacific Express, LLC d/b/a Marianas Southern Airways ("MSA") and Keith Stewart ("Defendants") submits their limited initial disclosures to Plaintiff Star Marianas Air Inc., and this Court.

A. WITNESSES

Pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure, Defendants offers the names of the following individuals who are likely to have discoverable information that Defendants may use to support their defenses and incorporates those disclosed by the Plaintiff.

Name of Witness	Contact Information	Subject of Information
Keith J. Stewart	c/o Colin M. Thompson	All information regarding
	Thompson Law, LLC	the formation of MSA,
		negotiations with the CN
		Government and Souther
		Airways Express, LLC.
William Giles	c/o Colin M. Thompson	All information regarding
	Thompson Law, LLC	the operations of MSA.
Jerry Barcinas	c/o Colin M. Thompson	All information relating t
	Thompson Law, LLC	the business operations o
		MSA in Rota.
Maureen Ciano	c/o Colin M. Thompson	All information relating t
	Thompson Law, LLC	the business operations o
		MSA in Saipan.
John Filler	c/o Colin M. Thompson	All information relating t
	Thompson Law, LLC	the business operations o
	,	MSA in Guam.
Ian Vanderbeek	c/o Colin M. Thompson	All information relating t
	Thompson Law, LLC	the business operations o
	Thompson Euw, EEC	MSA.
David Atalig	Unknown	All information relating t
	Cincile will	the agreements entered by
		MSA with the CNMI
		Government.
Stan Little	c/o Sean E. Frink	All information regarding
	Marianas Legal Strategy	the formation of MSA,
	Group, LLC	negotiations with the CN
	Group, EEC	Government and Souther
		Airways Express, LLC.
Keith Sisson	c/o Sean E. Frink	All information regarding
	Marianas Legal Strategy	the formation of MSA,
	Group, LLC	negotiations with the CN
	Group, LLC	Government and Souther
		Airways Express, LLC.
James Smith	c/o Sean E. Frink	All information regarding
	Marianas Legal Strategy	the formation of MSA,
		negotiations with the CN
	Group, LLC	Government and Souther
		Airways Express, LLC, a
		the operations of MSA.

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B. DOCUMENTS

Documents include the following: 1) corporate records sufficient to identify the legal names, structures, and descriptions of the entities involved, 2) email communications relevant to the events of this action, 3) correspondence with governmental agencies, third parties, and internal personnel relevant to the events of this action, 4) employee personnel files. Defendants shall supplement these initial disclosures as necessary pursuant to Fed. R. Civ. P. 26(a)(1)(b).

C. DAMAGES COMPUTATION

Not applicable.

D. INSURANCE

Defendants are unaware of any insurance coverage that would provide coverage for the claims asserted against Keith Stewart and MSA in this lawsuit.

Respectfully submitted on May 22, 2025.

/s/ Colin. M. Thompson

THOMPSON LAW, LLC

Colin M. Thompson, Esq.

Attorneys for Marianas Pacific
Express, LLC d/b/a Marianas
Southern Airways and Keith Stewart